

MARTIN S. PUTNAM, SBN: 160951  
LAW OFFICES OF MARTIN PUTNAM  
1300 Clay Street, Suite 600  
Oakland, CA 94612  
Tel: (510) 466-6300  
Fax: (510) 225-2625  
[martin@putnamlaw.com](mailto:martin@putnamlaw.com)

Attorneys for Defendant and Cross-Complainant  
Hanlees Fremont, Inc.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO COURTHOUSE**

Weerachai Chaiwong, an individual,

Plaintiff,

v.

Hanlees Fremont, Inc., a California corporation,  
dba Hanlees Fremont Hyundai;  
Ally Financial, Inc., a Delaware corporation; and  
Does 1 through 75, inclusive,  
Defendants.

) Case No. 3:16-cv-04074-HSG

)  
) Stipulation to Extend Time for Hanlees  
) Fremont, Inc. to Respond to Ally Financial,  
) Inc.'s Notice of Motion and Motion to  
) Dismiss Cross-Claims pursuant to  
) Local Rule 6-1, and to Extend Time for  
) Ally's Reply Thereto

) Hearing Date: January 26, 2017

) Time: 2:00 p.m.

) Judge: Hon. Haywood S. Gilliam, Jr.

) Courtroom: 10

)  
) Action Filed: May 25, 2016

Removed: July 20, 2016

Pursuant to Local Rule 6-1, Defendant Hanlees Fremont, Inc. ("Hanlees") and  
Defendant Ally Financial Inc. ("Ally") (together, the "Parties") by and through their  
respective counsel of record, hereby stipulate as follows:

**STIPULATION**

WHEREAS, Defendant Ally Financial filed a Notice of Motion and Motion to Dismiss the Cross-Claims of Defendant Hanlees Fremont, Inc. (“Motion to Dismiss”) on November 7, 2016;

WHEREAS, Hanlees’ response to the Motion to Dismiss is presently due for filing and service on November 21, 2016, and Ally’s reply to Hanlees’ response is presently due November 28, 2016;

WHEREAS, Ally has agreed to extend Hanlees’ time to respond to the Motion to Dismiss by fourteen (14) days, until December 5, 2016, to allow Hanlees sufficient time to respond in view of the issues raised, Hanlees counsel’s trial schedule and staff availability;

WHEREAS, Hanlees has agreed to extend Ally’s time to reply to Hanlees’ response to the Motion to Dismiss by fourteen (14) days after the stipulated new due date for Hanlees’ response, until December 19, 2016, to allow Ally sufficient time to reply to Hanlees’ response to the Motion to Dismiss in view of Ally’s counsel’s trial schedule; and

WHEREAS, this extension will not have any effect on the current schedule for the case;

IT IS HEREBY STIPULATED TO, by and between the Parties herein, through their respective attorneys of record, that Hanlees will have a fourteen (14) day extension, up to and including December 5, 2016, in which to file and serve a response to Ally’s Motion to Dismiss; and Ally will have (14) days thereafter, until December 19, 2016, in which to file and serve a reply to Hanlees’ response.

This Stipulation is the first extension of time to respond to Ally’s Motion to Dismiss requested by Hanlees, and is the first extension of time to reply to Hanlees’

1 response requested by Ally, and is made without prejudice to, or waiver of, any rights or  
2 defenses otherwise available to the Parties in this action.

3  
4 DATED: November 21, 2016 SEVERSON & WERSON  
5 A Professional Corporation

6 By: /s/ Mary Kate Kamka  
7 Mary Kate Kamka  
8 Attorneys for Defendant ALLY FINANCIAL INC.  
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11 LAW OFFICES OF MARTIN PUTNAM

12 Dated: November 21, 2016 By: /s/ Martin S. Putnam  
13 Martin S. Putnam  
14 Attorneys for Defendant and Cross-Complainant  
15 Hanlees Fremont, Inc.  
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20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
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23 Dated: December 7, 2016 By: Haywood S. Gilliam, Jr.  
24 Judge Haywood S. Gilliam, Jr.  
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